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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,) No.
)
Plaintiff,) <u>COUNTS 1-3:</u>
) SEXUAL EXPLOITATION OF A CHILD
v.) – DISTRIBUTION AND RECEIPT OF
) CHILD PORNOGRAPHY
ERIC WHITEBREAD,) Vio. of 18 U.S.C. § 2252(a)(2)
) and (b)(1)
Defendant.)
) <u>COUNT 4:</u>
) SEXUAL EXPLOITATION OF A CHILD
) – POSSESSION OF CHILD
) PORNOGRAPHY
) Vio. of 18 U.S.C. § 2252(a)(4)(B)
) and (b)(2)
)
) <u>CRIMINAL FORFEITURE</u>
) <u>ALLEGATION :</u>
) Vio. 18 U.S.C. § 2252(a)(2) and (a)(4)(B)
)

INDICTMENT

The Grand Jury charges that:

COUNT 1:

Sexual Exploitation of a Child – Distribution of Child Pornography

Between on or about June 23, 2015, and June 25, 2015, within the District of Alaska, the defendant, ERIC WHITEBREAD, did knowingly distribute, by any means and facility of interstate and foreign commerce, visual depictions of minors engaging in sexually explicit conduct, including, but not limited to: “Cp Tvg 13 Bond 10-11-12Yo Childlover Little Collection Video 0039 Girl- [REDACTED] String Bikini Pthc 11Yo Pedofilia.mpg,” and “[REDACTED] plays with dog.avi,” the production of which involved the use of minors engaging in sexually explicit conduct.

All of which is in violation of Title 18, United States Code, Section 2252(a)(2) and (b)(1).

COUNT 2:

Sexual Exploitation of a Child – Distribution of Child Pornography

Between on or about June 29, 2015, and July 1, 2015, within the District of Alaska, the defendant, ERIC WHITEBREAD, did knowingly distribute, by any means and facility of interstate and foreign commerce, visual depictions of minors engaging in sexually explicit conduct, including, but not limited to: “Cbaby - Toddler girl [REDACTED] [daddy cums again.part 2].mpg,” and “13.avi,” the production of which involved the use of minors engaging in sexually explicit conduct.

All of which is in violation of Title 18, United States Code, Section 2252(a)(2) and (b)(1).

COUNT 3:

Sexual Exploitation of a Child – Receipt of Child Pornography

Between on or about July 14, 2015, and on or about August 24, 2015, within the District of Alaska, the defendant, ERIC WHITEBREAD, did knowingly receive, by any means and facility of interstate and foreign commerce, visual depictions of minors engaging in sexually explicit conduct, the production of which involved the use of minors engaging in sexually explicit conduct.

All of which is in violation of Title 18, United States Code, Section 2252(a)(2) and (b)(1).

COUNT 4:

Sexual Exploitation of a Child – Possession of Child Pornography

On or about September 2, 2015, within the District of Alaska, the defendant, ERIC WHITEBREAD, did knowingly possess matter containing visual depictions of minors engaging in sexually explicit conduct that have been mailed, and shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which were produced using materials that have been mailed and shipped and transported, by any means including by computer.

The visual depictions were produced using minors engaging in sexually explicit conduct, including, but not limited to prepubescent minors and minors who had not attained the age of 12, and the visual depictions were of such conduct.

All of which is in violation of Title 18, United States Code, Section (a)(4)(B) and (b)(2).

CRIMINAL FORFEITURE ALLEGATION:

Upon conviction for violating Title 18, United States Code, Section 2252(a)(2) and (a)(4)(B), as alleged in this Indictment, defendant ERIC WHITEBREAD, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, his interest in any and all matter which contains visual depictions produced, transported, mailed, shipped, or received in violation thereof; any property constituting or traceable to gross profits or other proceeds the defendant obtained as a result of the aforementioned violation; and any and all property used or intended to be used to commit and to promote the commission of the aforementioned violation, including but not limited to the following:

- (1) an Apple Laptop, model A1181, serial number W8808BGVOP2.

If any property subject to forfeiture, as a result of the offenses alleged in this Indictment cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed

beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, it is the intent of the United States, pursuant to Title 18, United States Code, Section 2253(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 2253 and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Kyle Reardon
KYLE REARDON
United States of America
Assistant U.S. Attorney

s/ Frank V. Russo for
KAREN L. LOEFFLER
United States of America
United States Attorney

DATE: March 16, 2016